

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KONINKLIJKE PHILIPS N.V. and PHILIPS  
LIGHTING NORTH AMERICA,  
CORPORATION,

Plaintiffs,

v.

IGUZZINI LIGHTING USA, LTD.,  
IGUZZINI LIGHTING NORTH AMERICA,  
INC., and  
IGUZZINI ILLUMINAZIONE S.P.A.,

Defendants.

Civil Action No.: 1:15-cv-3979-WHP-FM

**AMENDED COMPLAINT  
JURY TRIAL DEMANDED**

Plaintiffs Koninklijke Philips N.V. (“KPNV”) and Philips Lighting North American Corporation (“PLNA”) (collectively, “Philips”) bring this amended complaint for patent infringement against Defendants iGuzzini Lighting USA, Ltd., iGuzzini Lighting North America, Inc., and iGuzzini Illuminazione S.p.A. (collectively, “iGuzzini”).

**NATURE OF THE ACTION**

1. This is an action for patent infringement under 35 U.S.C. § 271, et seq., by Philips against iGuzzini for infringement of United States Patent Nos. 6,094,014 (“the ’014 patent”), 6,250,774 (“the ’774 patent”), 6,577,512 (“the ’512 patent”), 6,586,890 (the ’890 patent), 7,262,559 (“the ’559 patent”), 7,802,902 (“the ’902 patent”), and 7,806,558 (“the ’558 patent”) (collectively, the “patents-in-suit”).

**THE PARTIES**

2. Plaintiff Koninklijke Philips N.V., formerly known as Koninklijke Philips Electronics N.V., is a corporation organized and existing under the laws of the Netherlands, with a principal place of business at Breitner Center, Amstelplein 2, 1096 BC Amsterdam, The Netherlands.

3. Plaintiff Philips Lighting North America Corporation is a corporation organized and existing under the laws of Delaware, with a principal place of business at 200 Franklin Square Drive, Somerset, New Jersey 08873.

4. Upon information and belief, Defendant iGuzzini Lighting USA, Ltd. is a corporation organized and existing under the laws of Delaware, with a principal place of business at 60 Madison Avenue, 2nd Floor, New York City, NY 10010.

5. Upon information and belief, Defendant iGuzzini Lighting North America, Inc. is a corporation organized and existing under the laws of Canada, with a principal place of business at 5455 Ave De Gaspe Suite 100, Montreal Quebec Canada, H2T-3B3.

6. Upon information and belief, Defendant iGuzzini Illuminazione S.p.A. is a corporation organized and existing under the laws of Italy, with a principal place of business at Via Mariano Guzzini 37 62019 Recanati (MC), Italy.

### **JURISDICTION AND VENUE**

7. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

8. Upon information and belief, iGuzzini has made, used, provided, sold, offered to sell, imported, or distributed to others for such purposes, lighting products and systems employing light-emitting diodes (“LEDs”) for illumination (“LED Lighting Devices”) throughout the United States, including New York and this judicial district.

9. Upon information and belief, iGuzzini maintains or has maintained continuous and systematic contacts with New York and this judicial district and/or has committed tortious activity within the district.

10. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b), (c) and/or 1400(b), as inter alia iGuzzini is subject to personal jurisdiction in this district.

### **FACTUAL BACKGROUND**

11. Upon information and belief, iGuzzini's LED Lighting Devices include, without limitation, products under the iGuzzini brand, including without limitation the Laser Blade, Primopiano-LED, Woody LED, Wow LED, and Palco LED lines. iGuzzini's LED Lighting Devices include interior and exterior lighting products including downlights, projector and track lights, pendant and modular system lights, wall mounted lights, ceiling lights, table lights, pole mounted lights, flood lights, in-ground lights, bollard lights, wall recessed lights, and graphic lighting products.

### **COUNT I: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,094,014**

12. Plaintiffs incorporate by reference paragraphs 1-11 as if fully set forth herein.

13. On July 25, 2000, the U.S. Patent and Trademark Office ("Patent Office") duly and legally issued the '014 patent, entitled "Circuit Arrangement, and Signaling Light Provided with the Circuit Arrangement," to Marcel J. M. Bucks et al. Plaintiff KPNV is the assignee and owner of the '014 patent, a copy of which is attached hereto as Exhibit A.

14. Upon information and belief, iGuzzini is engaged in activities that infringe the '014 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Woody LED products, in the United States.

15. Upon information and belief, iGuzzini is aware of the '014 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiffs' patent rights.

16. Plaintiffs have been and continue to be injured by the infringing activities of iGuzzini.

**COUNT II: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,250,774**

17. Plaintiffs incorporate by reference paragraphs 1-11 as if fully set forth herein.
18. On June 26, 2001, the Patent Office duly and legally issued the '774 patent, entitled "Luminaire," to Simon H. A. Begemann et al. Plaintiff KPNV is the assignee and owner of the '774 patent, a copy of which is attached hereto as Exhibit B.
19. Upon information and belief, iGuzzini is engaged in activities that infringe the '774 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Laser Blade downlight, Primopiano-LED projector, Wow LED, and Woody LED products, in the United States.
20. Upon information and belief, iGuzzini is aware of the '774 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiffs' patent rights.
21. Plaintiffs have been and continue to be injured by the infringing activities of iGuzzini.

**COUNT III: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,577,512**

22. Plaintiffs incorporate by reference paragraphs 1-11 as if fully set forth herein.
23. On June 10, 2003, the Patent Office duly and legally issued the '512 patent, entitled "Power Supply for LEDs," to Ajay Tripathi et al. Plaintiff KPNV is the assignee and owner of the '512 patent, a copy of which is attached hereto as Exhibit C.
24. Upon information and belief, iGuzzini is engaged in activities that infringe the '512 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Woody LED, Palco LED and Primopiano-LED projector products, in the United States.
25. Upon information and belief, iGuzzini is aware of the '512 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiffs' patent rights.

26. Plaintiffs have been and continue to be injured by the infringing activities of iGuzzini.

**COUNT IV: PATENT INFRINGEMENT OF U.S. PATENT NO. 6,586,890**

27. Plaintiffs incorporate by reference paragraphs 1-11 as if fully set forth herein.

28. On July 1, 2003, the Patent Office duly and legally issued the '890 patent, entitled "LED Driver Circuit with PWM Output," to Young-Kee Min et al. Plaintiff KPNV is the assignee and owner of the '890 patent, a copy of which is attached hereto as Exhibit D.

29. Upon information and belief, iGuzzini is engaged in activities that infringe the '890 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Woody LED, Palco LED and Primopiano-LED projector products, in the United States.

30. Plaintiffs have been and continue to be injured by the infringing activities of iGuzzini.

**COUNT V: PATENT INFRINGEMENT OF U.S. PATENT NO. 7,802,902**

31. Plaintiffs incorporate by reference paragraphs 1-11 as if fully set forth herein.

32. On September 28, 2010, the Patent Office duly and legally issued the '902 patent, entitled "LED Lighting Fixtures," to Timothy B. Moss et al. Plaintiff KPNV is the assignee and owner of the '902 patent, a copy of which is attached hereto as Exhibit E.

33. Upon information and belief, iGuzzini is engaged in activities that infringe the '902 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Palco LED products, in the United States.

34. Plaintiffs have been and continue to be injured by the infringing activities of iGuzzini.

**COUNT VI: PATENT INFRINGEMENT OF U.S. PATENT NO. 7,262,559**

35. Plaintiffs incorporate by reference paragraphs 1-11 as if fully set forth herein.

36. On August 28, 2007, the U.S. Patent and Trademark Office (“Patent Office”) duly and legally issued the ’559 patent, entitled “LEDs Driver,” to Ajay Tripathi et al. Plaintiff KPNV is the assignee and owner of the ’559 patent, a copy of which is attached hereto as Exhibit F.

37. Upon information and belief, iGuzzini is engaged in activities that infringe the ’559 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Woody LED, Palco LED, and Primopiano-LED projector products, products, in the United States.

38. Upon information and belief, iGuzzini is aware of the ’559 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiffs’ patent rights.

39. Plaintiffs have been and continue to be injured by the infringing activities of iGuzzini.

**COUNT VII: PATENT INFRINGEMENT OF U.S. PATENT NO. 7,806,558**

40. Plaintiffs incorporate by reference paragraphs 1-11 as if fully set forth herein.

41. On October 5, 2010, the U.S. Patent and Trademark Office (“Patent Office”) duly and legally issued the ’558 patent, entitled “Methods and Apparatus for Providing Uniform Projection Lighting,” to Ryan C. Williamson. Plaintiff PLNA is the assignee and owner of the ’558 patent, a copy of which is attached hereto as Exhibit G.

42. Upon information and belief, iGuzzini is engaged in activities that infringe the ’558 patent under 35. U.S.C. § 271 by making, using, offering to sell, selling and/or importing LED Lighting Devices, including without limitation its Woody LED products, in the United States.

43. Upon information and belief, iGuzzini is aware of the ’558 patent and its infringement is deliberate, willful, and in reckless disregard of Plaintiffs’ patent rights.

44. Plaintiffs have been and continue to be injured by the infringing activities of iGuzzini.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request the following relief:

- (a) a declaration that iGuzzini infringes the patents-in-suit and a final judgment incorporating same;
- (b) entry of preliminary and/or permanent equitable relief, including but not limited to a preliminary and/or permanent injunction that enjoins iGuzzini and any of its officers, agents, employees, assigns, representatives, privies, successors, and those acting in concert or participation with it from infringing and/or inducing infringement of the patents-in-suit;
- (c) an award of damages sufficient to compensate Plaintiffs for infringement of the patents-in-suit by iGuzzini, together with prejudgment and post-judgment interest;
- (d) a declaration or order finding that iGuzzini's infringement is willful and an order trebling damages under 35 U.S.C. § 284;
- (e) a judgment holding that this is an exceptional case under 35 U.S.C. § 285 and awarding Plaintiffs their reasonable attorneys' fees, costs, and expenses; and
- (f) such other relief deemed just and proper.

**JURY DEMAND**

Under Rule 38 of the Federal Rules of Civil Procedure, Plaintiffs hereby demand trial by jury of all issues so triable by a jury in this action.

Dated: November 19, 2015

Respectfully submitted,

/s/ Denise W. DeFranco

Denise W. DeFranco (*pro hac vice*)  
denise.defranco@finnegan.com  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP  
Two Seaport Lane  
Boston, MA 02210  
Telephone: (617) 646-1600  
Facsimile: (617) 646-1666

C. Brandon Rash (*pro hac vice*)  
brandon.rash@finnegan.com  
Cara Regan Lasswell (*pro hac vice*)  
cara.lasswell@finnegan.com  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP  
901 New York Avenue, NW  
Washington, DC 20001  
Telephone: (202) 408-4000  
Facsimile: (202) 408-4400

Christopher P. Borello (Reg. No. 4130225)  
cborello@fchs.com  
Susanne Flanders (Reg. No. 4803177)  
sflanders@fchs.com  
FITZPATRICK CELLA HARPER &  
SCINTO  
1290 Avenue of the Americas  
New York, New York 10104-3800  
Telephone: (212) 218-2100  
Facsimile: (212) 218-2200

**Attorneys for Plaintiffs**

Koninklijke Philips N.V. and  
Philips Lighting North America Corporation



**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on November 19, 2015.

/s/ Denise W. DeFranco

Denise W. DeFranco (*pro hac vice*)

denise.defranco@finnegan.com

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP

Two Seaport Lane

Boston, MA 02210

Telephone: (617) 646-1600

Facsimile: (617) 646-1666

**Attorney for Plaintiffs**

Koninklijke Philips N.V. and

Philips Lighting North America Corporation